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went out on strike and caused his places of business to be "picketed." The pickets patrolled the sidewalks in front of his premises and carried placards reading, "This café is unfair to union labor." There was some evidence of disorder and of attempts to intimidate patrons. The plaintiff's business fell off largely. An injunction was issued forbidding, among other things, picketing or patrolling the sidewalks adjacent to the plaintiff's premises with such placards, or dissuading persons who sought to enter the premises from patronizing or working for the plaintiff. *Held*, that the injunction was properly granted. Two judges *dissenting*. *Local Union No. 313, etc. v. Stathakis* (1918, Ark.) 205 S. W. 450.

The subject of enjoining picketing had not before been passed upon by the Arkansas court. The opinion lays down the principle that a labor union which is on strike is privileged to give publicity to that fact but, in doing so, must not disregard the "right of the employer to employ whom he pleases" and to carry on business with the public free from coercive molestation. The actual decision, affirming the sweeping injunction, seems in fact to go beyond this principle and to forbid any kind of picketing immediately adjacent to the premises. Picketing there, the court treats as *per se* coercive; while picketing at a distance "gives the member of the public whose support is thus solicited an opportunity for reflection." That picketing is *per se* coercive is likewise held in *Webb v. Cooks', Waiters' etc. Union* (1918, Tex. Civ. App.) 205 S. W. 465.

TRUSTS—CONSTRUCTIVE TRUST—ORAL PROMISE OF HEIR TO HOLD LAND IN TRUST.—The plaintiff was sole heir to her father. The latter when about to die asked plaintiff to promise to divide all his property equally between herself and the defendant. The plaintiff so promised, assuring the father that no will would be necessary to carry out his wishes. Defendant knew nothing about the promise until after the death of the father and the probate of the will. The plaintiff purchased with a portion of the funds, not amounting to half, a piece of real estate and placed defendant in possession of the same, stating at the time that she gave it to her. In no other way did she give the defendant any portion of the property inherited from the father. Plaintiff, who had never conveyed the legal title to the land, brought the present action to recover possession of the same. *Held*, that plaintiff had only a bare legal title and was not entitled to possession. *Barrett v. Thielen* (1918, Minn.) 167 N. W. 1030.

The court reached its conclusion on the following grounds: (1) that an heir, who makes an oral promise to his ancestor to dispose of the property for the benefit of certain persons and thereby leads the ancestor to refrain from making a will, is in equity a constructive trustee for the intended beneficiaries; (2) that the land in question was therefore purchased with funds and under the circumstances belonged in equity to the defendant; (3) that under Minnesota code procedure an "equitable title" may be set up as a defense to an action for possession brought by the holder of a "legal title without beneficial interest." The view of the court as to the first point is the prevailing one. (1918) 27 YALE LAW JOURNAL, 389. It was applied in the recent case of *Arntson v. First Nat. Bank* (1918, N. D.) 167 N. W. 760. The second proposition follows if the first be admitted. Upon the third point the law in Minnesota differs from that in many, perhaps most, code jurisdictions. See (1917) 26 YALE LAW JOURNAL, 592.

TRUSTS—UNINCORPORATED ASSOCIATIONS—DISPOSITION OF PROPERTY ON DISSOLUTION.—Funds were held in trust for a constantly changing group of beneficiaries—injured employees of a mining company and their dependents in case